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SUSAN V. TIPOGRAPH

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/20/2016

FILED BY ECF

September 19, 2016

Honorable Paul A. Engelmayer
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: **United States v. Kaye Rosado**
Docket Nos.: S4 15 Cr. 445 (PAE)
15 Cr. 430 (PAE)

Dear Judge Engelmayer:

As the Court is aware, I was assigned to represent Mr. Rosado on August 30, 2016, with the understanding that this matter was scheduled for trial on October 24, 2016. With the assistance of a colleague, Abraham Hassen, I have begun accomplishing in two months what other counsel have had well over a year to do: get to know the client, review the discovery, engage in plea discussions and prepare for trial. With the exception of the issues raised below, I am confident that we will accomplish all.

The schedule, as I understand it, requires any party proceeding to trial to file any in limine motions by September 19th, and responses by the opposing party by September 26, 2016. Given the massive amount of discovery in these matters and the extensive Court records, it is not reasonably possible for us to comply with these deadlines. We will work to identify any possible in limine issues relating to Mr. Rosado. I have discussed some of these scheduling matters with the government.

With the Court's permission, we would submit papers that would put the Court and all parties on notice of the relief being sought by Mr. Rosado, as well as preserving any appellate issues for Mr. Rosado. We would file letter briefs in support of those applications and oppose any filed by the government. I would hope that the Court would understand if our briefs did not have the depth and breadth of a law review article.

Given the time constraints and the extent of the work, shortly after I was assigned by this court, I asked a colleague, Abraham Hassen if he would be interested in working on Mr. Rosado's case. I have worked with Mr. Hassen, a 2014 graduate of NYU Law School, on a number of other matters for the three or so years that I have known him.

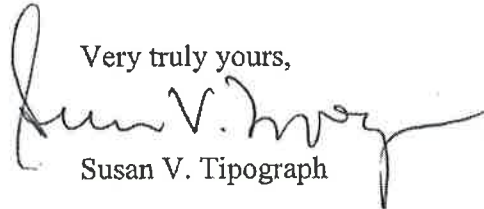
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Other than for some work* our work would not be duplicative and, in fact, Mr. Hassen could accomplish a lot of the work at a more economical rate than mine.

I am requesting, therefore, that this Court assign Mr. Hassen as Associate Counsel at a rate of \$85.00 per hour for up to 100 hours. If it will require additional time, I would seek additional authorization from this court. I would also ask that the Court's appointment be ordered nunc pro tunc to September 1, 2016. I am attaching a CJA 21 form for your Honor.

Should the Court require any additional information, please let me know. I thank you in advance for your attention and courtesy.

Very truly yours,



Susan V. Tipograph


enc.

cc: All Counsel (by ECF)

GRANTED, Mr. Hassan is appointed *nunc pro tunc* to September 1, 2016. Counsel is advised that all CJA vouchers must now be made electronically. The Clerk of Court is requested to terminate the motion at Dkt. No. 22 in 15 Cr. 430. Going forward, all requests by Mr. Rosado need only be filed in case 15 Cr. 445.

9/19/2016

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

* There may be occasions when Mr. Hassen and myself would visit Mr. Rosado together, and meetings with each other.